

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	

**Telecommunications Management Group, LLC – Amendment to Report on
Implementation of Wireless E911 Phase II
Automatic Location Identification**

Telecommunications Management Group, LLC (“TMG”) hereby submits an amendment to its report regarding implementation of wireless E911 Phase II Automatic Location Identification (“ALI”).¹

I. Background/Contact Information

A. Carrier Identifying Information

Name: Telecommunications Management Group, LLC

B. Contact Information

Name: Dave Abel

Title: Project Manager

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¹ It should be noted that TMG has filed an application on FCC Form 603 (file no. 0000869287) for approval to assign its F Block Broadband Personal Communications Service Station KNLG203 (BTA 246, Laurel, Mississippi) to Cellular XL Associates, L.P. That application is currently pending before the Commission.

II. E911 Phase II Location Technology Information

A. Type of Technology

At the time it filed its original report, TMG had not selected a solution for its Phase II Automatic Location Identification (“ALI”) technology due to a lack of information available from switch and handset manufacturers to enable it to make an informed decision. Although TMG still is not able to adequately compare various Phase II solutions due to a continued lack of information from manufacturers, it is compelled at this time to select a solution nonetheless.

Accordingly, TMG elects to utilize a network-based solution under Phase II of E911 implementation and intends to select a vendor for provision of this technology. TMG had contacted several handset manufacturers to explore handset-based solutions, which were expected to be significantly less expensive than network-based solutions. The Commission has recognized that handset-based solutions seem to be well-suited to rural wireless markets, where TMG primarily provides service. *See* E911 Third Report and Order, 14 FCC Rcd 17388, 17390-91 (1999).

However, TMG has found no viable handset-based solution available. Accordingly, despite the significant drawbacks of using a network-based solution, including the extremely high cost of implementation of such a solution, TMG feels that it has no other choice at this time but to select a network-based technology for provision of ALI, in light of the Commission’s requirements and deadlines.

TMG, however, has grave concerns regarding E911 Phase II implementation by rural wireless carriers in light of the fact that no handset-based solution appears to be available in the near future. It is with extreme reluctance that TMG is selecting a network-based solution. Similarly-situated carriers have estimated that implementation of a network-based solution will cost approximately \$40,000 per base station, which is an overwhelming figure in relation to TMG’s capital budget for 2002. Accordingly, TMG is searching for a vendor who can provide a network-based solution at a price that won’t jeopardize the financial stability of the company.

B. Testing and Verification

Although TMG has not yet identified a vendor to provide a feasible network-based solution for its rural wireless markets, TMG intends to comply with OET Bulletin No. 71 with respect to testing and verification methods used to gauge the accuracy of the ALI solution selected.

C. Implementation Details and Schedule

Once TMG has been able to identify a vendor to provide a network-based solution, TMG will work with that vendor to determine a feasible implementation plan and schedule.

D. PSAP Interface

TMG intends to implement the necessary hardware and software changes to timely deliver the Phase II information to a PSAP after receipt of a valid Phase II request. Currently, E911 Phase I procedures require TMG to interface with BellSouth, and BellSouth, in turn, to interface with PSAPs. Accordingly, TMG expects that it will send the Phase II information through an appropriate interface to BellSouth and that BellSouth will then send the Phase II information on to the PSAP.

E. Existing Handsets

Due to the fact that TMG has selected a network-based solution at this time, it does not presently have an upgrade and/or replacement strategy for existing handsets.

F. Location of Non-Compatible Handsets

Because TMG intends at this time to utilize a network-based solution to implement Phase II E911, it anticipates that existing customer handsets will be compatible with such a solution. Accordingly, it does not currently have plans to locate existing customer handsets for upgrading and/or replacement.

G. Other Information

At this time, TMG has not received any PSAP requests for Phase II E911 implementation.

June 13, 2002